

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: BIO - Biotechnology Industry Organization
Sent: Thur 4/30/2015 7:15:36 PM
Subject: BIO Newsletter: April 30, 2015

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04.30.2015

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BIO INTERNATIONAL CONVENTION

Monday, June 15th Declared "BIO Superhero Day" in Philadelphia

Last week, Philadelphia Mayor Michael Nutter declared Monday, June 15th "BIO Superhero Day" in the City of Philadelphia in honor of the BIO International Convention's Everyday Superhero contest, which celebrates the contributions of the men and women of biotechnology who work tirelessly each day to heal, fuel and feed the world...

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21ST CENTURY CURES

BIO Praises the Release of 21st Century Cures Initiative Discussion Draft

BIO applaud the Committee on Energy and Commerce for releasing

[its 21st Century Cures Initiative discussion draft intended to accelerate the discovery, development and delivery of next generation modern medicines...](#)
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BIO INTERNATIONAL CONVENTION

Congrats to the 2015 Buzz of BIO Winners

[We're very pleased to announce the winners for the 2015 Buzz of BIO contest of the BIO International Convention...](#)

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The Power of Innovation

[Fox and Friends included an informative segment about the staggering advances being made in cancer care thanks to new and forthcoming innovative treatments...](#)

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BIO Principles on Expanded Access to Investigational, Unapproved Medicines

[We believe that the best way to make innovative biotechnology medicines available to patients is through the efficient development of approved, safe and effective products...](#)

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GMOS

Why the Founder of the Anti-GMO Movement Converted to the Side of Science


[Lynas is a British environmentalist and author who once founded the movement against genetically modified foods in the mid 1990s...](#)

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FOOD AND AGRICULTURE

Inventors of Life-Saving Golden Rice Receive Prestigious Patents for Humanitarian Award

[On Monday, April 21, 2015, the White House Office of Science and Technology Policy and the U.S. Patent and Trademark Office announced the recipients of the 2015 Patents for Humanity Award...](#)

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2015 BIO WORLD CONGRESS

2015 BIO World Congress to Showcase Canada's Industrial Biotech Industry

[BIO has announced plenary and breakout session programs that will feature executives, industry experts and academics from Canada-based organizations, companies, and universities...](#)

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Statement Regarding the Introduction of Senate Patent Reform Legislation

BIO appreciates the good faith efforts of the co-sponsors of the PATENT Act...

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JOBS ACT

Biotech Leader Provides Testimony on Legislative Proposals to Enhance Capital Formation and Reduce Regulatory Burdens

The success of the Jumpstart Our Business Startups Act in the biotech industry means that the work of the Subcommittee on Capital Markets and Government Sponsored Enterprises has taken on increased importance for emerging biotech companies...

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April is Donate Life Month! Walk with the National Kidney Foundation on May 16!

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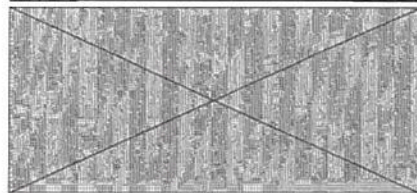
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The BIO World Congress on Industrial Biotechnology is the world's largest industrial biotechnology event for business leaders, investors, and policy makers in biofuels, biobased products, and renewable chemicals...

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Senior Manager Quality Control, Raw Material Support, BAYER

Berkeley, California, United States
April 14, 2015

Biostatistician, General Dynamics Information Technology- Military Health Services

Bethesda, Maryland, United States
March 23, 2015

Post-Doc, University of Rochester

Rochester, New York, United States
April 7, 2015

Research Associate - Mass Spectrometry, OncoPlex Diagnostics

Rockville, Maryland, United States
April 12, 2015

Sr. Regulatory Specialist, Biotech Center of Expertise, BASF Corporation

San Diego, California, United States
April 12, 2015

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To: Hengst, Benjamin[Hengst.Benjamin@epa.gov]
Cc: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Lindsay Fitzgerald
Sent: Thur 4/23/2015 6:21:52 PM
Subject: CBI_NBB meeting with EPA
NBB for EPA 4 23 15.pptx *ex.4*
EPA RFS Slides Apr 2015 FINAL DRAFT.pptx *ex.4*

Ben and Paul-

Attached are the slides we will be reviewing with you all today.

We will bring print outs.

Please share with folks in AA that will be joining.

Note, all slides are claimed as CBI and labeled as such.

Thank you,

Lindsay

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Mon 4/20/2015 3:36:18 PM
Subject: Margo's book

Paul, did you make the event, I was jammed up.

Michael J. McAdams | Holland & Knight
Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Mon 3/30/2015 3:03:52 PM
Subject: RE: lunch

Headed to the castle.

Michael J. McAdams | **Holland & Knight**
Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Thursday, March 26, 2015 1:27 PM
To: McAdams, Michael J (WAS - X75140)
Subject: RE: lunch

OK. 11:30?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Michael.McAdams@hklaw.com [mailto:Michael.McAdams@hklaw.com]
Sent: Thursday, March 26, 2015 12:13 PM
To: Argyropoulos, Paul
Subject: lunch

Paul, I just looked at my Calendar, let's do Monday rather than Wed.

Michael J. McAdams | Holland & Knight

Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Thur 3/26/2015 5:46:13 PM
Subject: RE: lunch

Great see you then. Have a good weekend.

Michael J. McAdams | **Holland & Knight**
Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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Sent: Thursday, March 26, 2015 1:27 PM
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Subject: RE: lunch

OK. 11:30?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

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Michael J. McAdams | **Holland & Knight**

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Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Thur 3/26/2015 4:12:39 PM
Subject: lunch

Paul, I just looked at my Calendar, let's do Monday rather than Wed.

Michael J. McAdams | Holland & Knight

Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Tue 3/17/2015 8:34:04 PM
Subject: at a secure undisclosed location

Paul, thought I would give you a call and catch up after last week. Quite interesting. All the best,

Michael J. McAdams | Holland & Knight

President, ABFA

Senior Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Wed 3/11/2015 8:47:40 PM
Subject: today

Thanks for the help on the Waiver credit, I orally made all the changes so that it was accurate. What a challenge it is to explain how it works and why to a press person. Fun day, think I am off some xmas card list now. All the best,

Michael J. McAdams | Holland & Knight
Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Wed 3/11/2015 12:13:21 AM
Subject: Re:

Thanks Paul. Very helpful. I want to be factually accurate. Please hold the speech close until the morning.

Sent from my iPhone

On Mar 10, 2015, at 7:30 PM, Argyropoulos, Paul
<Argyropoulos.Paul@epa.gov<mailto:Argyropoulos.Paul@epa.gov>> wrote:

Thanks again for sharing. Just one point for your consideration. Your point on refiners opting to buy waiver credits instead of 2014 cellulosic RINs is technically not true. We haven't set the waiver credit price for cellulosic credits for 2014 yet. Therefore they aren't available for purchase. A complicating factor is that 2013 compliance isn't even due yet. 2014 compliance is there for also delayed. So technically they can't effectively choose to buy one over the other yet. And they don't even know what their obligation is yet either. Just thought you might want to know that in case you want to modify your point.

Paul Argyropoulos
Senior Policy Advisor
USEPA
Office of Transportation and Air Quality
Office: 202-564-1123
Mobile: 202-577-9354

On Mar 10, 2015, at 6:48 PM, "Michael.McAdams@hklaw.com<mailto:Michael.McAdams@hklaw.com>"
<Michael.McAdams@hklaw.com<mailto:Michael.McAdams@hklaw.com>> wrote:

Paul: Here is my speech. Wall Street Journal is covering and it will be online tomorrow and potentially in print on Thursday. Doing my best my friend I take no shots at EPA, just talk about what we need and why we need the changes. Stuff you and I have talked about before. Best to the team.

Michael J. McAdams | Holland & Knight
President, ABFA
Senior Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com<http://www.hklaw.com/> | www.hklaw.com<http://www.hklaw.com/>

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Paul Argyropoulos
Senior Policy Advisor
USEPA
Office of Transportation and Air Quality
Office: 202-564-1123

~~XXXXXXXXXX~~ ex. 6

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Tue 3/10/2015 10:47:53 PM
ABLC oral Speech version March 2015_for WSJ.docx

Paul: Here is my speech. Wall Street Journal is covering and it will be online tomorrow and potentially in print on Thursday. Doing my best my friend I take no shots at EPA, just talk about what we need and why we need the changes. Stuff you and I have talked about before. Best to the team.

Michael J. McAdams | Holland & Knight

President, ABFA

Senior Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

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Prepared Remarks for Michael McAdams
Advanced Bioeconomy Leadership Conference Policy Outlook
March 11, 2015

Doug, ladies and gentleman, good morning. It is always good to be back with you at the ABLC.

I could have never imagined when I first spoke at this conference seven years ago that I would be here today forced to say that 2008 was a better year. Sadly, it's true.

Today, members of the Advanced Biofuels Association are facing incredible challenges, including diminishing capital markets, an uncertain tax code, and a patch-quilt of state laws and federal regulations. Unfortunately, the Renewable Fuels Standard (RFS) – the very tool that was created to foster our industry – has become one of the greatest obstacles to continued development of the advanced and cellulosic biofuel industry due to inconsistent and poor implementation.

Remember back to 2007 when the RFS amendments were debated and signed into law by an overwhelming bipartisan majority. Some members of Congress wanted to expand energy options to enhance our national security. Others were motivated by the promise of lower carbon fuels, while still other lawmakers were focused on economic opportunity for new jobs in rural America. But there was near unanimous agreement that the *ultimate prize* of the RFS, was to foster the development of the

advanced and cellulosic biofuel manufacturers who would use non-food feedstocks to produce next-generation fuels. In fact, the authors optimistically called for an additional 21 billion gallons by 2022, well beyond 15 billion gallons of corn ethanol.

Eight years after its passage, it is easy to see that the RFS may be working for some, but it is only minimally helpful to advance the promise and potential of next-generation renewable fuels. We need to acknowledge the simple fact: that the RFS is not equally helpful to all sectors of the biofuels industry.

Let's look at last year's performance to demonstrate this point, that one size does not fit all. According to the EPA EMTS system, the corn ethanol industry produced 14.3 billion gallons in 2014, while the biomass-based diesel pool – made up primarily of biodiesel – produced around 1.7 billion gallons. Those are billions with a “B” and healthy numbers. What do corn ethanol and biodiesel have in common? They use established technology, process traditional food feedstocks and have already built more production capacity than called for under the statute.

As for the non-biodiesel advanced and cellulosic sectors, last year's production was under 180 million gallons. That's better than nothing but not nearly enough. The current RFS simply doesn't work as well for companies trying to move cutting-edge technology from the demonstration plant to commercial scale – which necessarily involves

raising capital to build new production facilities. It's not working for three primary reasons.

First, is the inverse relationship between policy uncertainty and my members' ability to raise investment capital. Repeatedly missing deadlines to set annual RFS requirements and reducing those requirements below statutory levels has created significant uncertainty, and that ambiguity causes financing for advanced and cellulosic companies to evaporate.

Second, the calendar is now also working against us. Even if your company has a business plan that works when a barrel of oil costs \$50 and at today's RIN prices, capital markets now question whether the support provided by the RFS will exist after 2022. There's a reason most of us take out 30-year mortgages, but today's RFS uncertainty would have lenders requiring advanced and cellulosic companies to look at paying it off in seven years.

Another concern is the lack of a market for companies actually making cellulosic fuel. Let's say your company somehow manages to overcome the obstacles I've highlighted and produces cellulosic biofuel. Perversely, with EPA's current implementation, it is usually a much better deal for obligated parties to purchase a refundable waiver credit from the EPA than it is to buy your actual gallons with the cellulosic credit. That's why 33 million gallons of cellulosic biofuel RINs were left

sitting on the sidelines in 2014, because it was cheaper for oil companies to buy EPA cellulosic waiver credits.

After working with EPA since 2009 to attempt to get pathways approved, feedstocks approved, annual volume requirements released on time, only to frequently be told from the agency that they do not have sufficient legal authority to get the job done, it has become clear that statutory changes need to be made to the RFS. And that is why the members of ABFA are now calling on Congress to pass legislative fixes that will solve these problems.

- First, we need a minimum RIN value for cellulosic fuels that will provide enough certainty and stability for our members to build facilities and commercialize their innovative products. And because we are competing against fossil fuels produced at cash cost, using already built and fully depreciated facilities, cellulosic RIN values should also be indexed to the price of oil, providing more support when petroleum costs \$50 per barrel and less at \$100 per barrel.
- Second, Congress should show their support for advanced and cellulosic fuels by making it clear the program extends beyond 2022 to provide sufficient time to develop this industry. Again, we can't pay off the new plant in seven years.

- And lastly, we need to remove The loop hole that allows the oil industry to opt out from buying a cellulosic gallon with its credit and in lieu buying a waiver credit. The RFS should encourage production of all available advanced and cellulosic biofuels. But just as important, oil companies must be required to purchase what is produced so Americans can benefit from consuming these cleaner fuels.

In order to achieve such changes, the RFS needs to be amended legislatively. So I am announcing today that ABFA, at the instruction of our members, will actively seek to reform the program. We call on Congress, which has studied these issues for two years and held numerous hearings, to step up and pass the fixes I have outlined. We believe that if Congress enacts these changes, then the investment community will have the certainty necessary to finance continued development of the advanced and cellulosic industry.

As for the current mess setting annual volume requirements, we have advocated for over a year now to simply utilize the actual production numbers off the EMTS system. Reset the start times from November 30th to mid-February when the final numbers are available. Doing so will eliminate the difficulty in setting the RVO numbers each year and turns the function into a simple administrative function rather than a long, drawn-out debate which would require a long rule making process.

Most of you got into this business because we want to leave the world in better shape for the next generation – a mission that is as critical as ever.

By 2050, global population is expected to grow to 9 billion. The demand for liquid transportation fuels will increase because there's no other good option for powering the airplanes, heavy-duty trucks, diesel equipment and ocean-going vessels that will be necessary to move people and deliver freight. Next generation biofuels are still a critical part of the solution to finding more sustainable, lower carbon alternatives to provide the energy our world needs. At a minimum, they are a smart insurance policy.

If you are committed to fulfilling this mission, and if you believe like I do that advanced and cellulosic biofuels are still poised to flourish in the right environment, then I ask you to join us and work with the Advanced Biofuels Association to reform and strengthen the RFS so it can deliver the promise of next-generation renewable fuels.

Again, it is a pleasure to be with you today, and I look forward to your questions.

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Wed 3/4/2015 2:42:11 PM
Subject: ABLC

Paul, I see you guys are not speaking at the ABLC next week, you want me to inject anything in the discussion? Let's catch up. Did you see Guido committed suicide.

Michael J. McAdams | Holland & Knight

President, ABFA

Senior Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Mon 2/23/2015 3:18:21 PM
Subject: Hope you are well.

Hey Paul: I am back from break and wanted to touch base with you on a landzatech conversation. They told me they wanted me to write a letter, and I wanted to check with you on where it should go and to whom I should address it on their behalf. Thanks.

Michael J. McAdams | Holland & Knight

Senior Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Larry Schafer
Sent: Tue 8/26/2014 3:37:48 PM
Subject: RE: Catching up

Lunch (or at least beer)?

Larry Schafer

National Biodiesel Board

O: 202.737.8801

 *ex. 6*
LSchafer@Biodiesel.org

Biodiesel – America's Advanced Biofuel!

www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Tuesday, August 26, 2014 11:37 AM
To: Larry Schafer
Subject: RE: Catching up

Yes.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Larry Schafer [<mailto:lschafer@biodiesel.org>]

Sent: Tuesday, August 26, 2014 11:36 AM

To: Argyropoulos, Paul

Subject: RE: Catching up

Are you working on Friday?

Larry Schafer

National Biodiesel Board

O: 202.737.8801

EX. 6

LSchafer@Biodiesel.org

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www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]

Sent: Monday, August 11, 2014 10:31 AM

To: Larry Schafer

Cc: Anne Steckel

Subject: RE: Catching up

Hi Larry and Anne,

I can certainly check in with Chris on your request. His schedule is pretty tight over the next few weeks (both here and in Ann Arbor) however I'll see if he can offer up some times. However, he will be out of the office beginning next Thursday and not back in until the week of Sept 7th. It may be it will have to wait until his return. I'll see what's possible.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Larry Schafer [<mailto:lschafer@biodiesel.org>]
Sent: Monday, August 04, 2014 4:02 PM
To: Argyropoulos, Paul
Cc: Anne Steckel
Subject: Catching up

Paul,

Would like to see if there might be time in Chris's schedule to have lunch or coffee with Anne.

They have not had much if any opportunity to communicate directly with each other and thought we would extend an invitation to Chris.

Please let me know, whether you think we can get them together during the next couple of weeks or so.

Thank you.

Larry Schafer

National Biodiesel Board

O: 202.737.8801

2x 6

LSchafer@Biodiesel.org

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1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Lindsay Fitzgerald
Sent: Thur 8/21/2014 1:55:05 PM
Subject: New House
photo 1.JPG *ex. 6*
photo 2.JPG *ex. 6*

Finally! We are in.

Long time, no see. How are you holding up?

Catch up when you have time???

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Wed 6/18/2014 8:37:06 PM

Rumor floating that biogas was separated as a separate component from the pathways two rule.
Is that correct? Thanks.

Michael McAdams | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Thur 6/12/2014 3:34:35 PM
Subject: RE: HELP

A call would be most appreciated. If you could call me at the end of your day that would be great. I have a 2 and a 3. You have my cell [REDACTED] I am trying to keep all the Indians happy thanks.

ML

Michael McAdams | **Holland & Knight**
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Thursday, June 12, 2014 11:29 AM
To: McAdams, Michael J (WAS - X75140)
Subject: RE: HELP

Mike. Sorry but I'm out of the office the rest of the day, and out all day tomorrow. I'm at a conference today.

We can try for next week if that will help. If not, a call later today when I'm not in session.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Michael.McAdams@hklaw.com [mailto:Michael.McAdams@hklaw.com]

Sent: Thursday, June 12, 2014 11:24 AM

To: Argyropoulos, Paul

Subject: HELP

Paul: if lunch doesn't work could we find some time for a cup of coffee. Thanks, I am trying to keep three companies in line regarding various submissions. Thanks.

Michael McAdams | Holland & Knight

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Thur 6/12/2014 3:24:18 PM
Subject: HELP

Paul: if lunch doesn't work could we find some time for a cup of coffee. Thanks, I am trying to keep three companies in line regarding various submissions. Thanks.

Michael McAdams | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Fri 6/6/2014 1:57:12 PM
Subject: Lunch

Paul: You available for lunch today?

Michael McAdams | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Larry Schafer
Sent: Fri 5/30/2014 1:35:15 PM
Subject: RE: Thirsty?

Ok ... anytime is fine ... no pressure ..

Larry Schafer

National Biodiesel Board

O: 202.737.8801


LSchafer@Biodiesel.org

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www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Friday, May 30, 2014 9:16 AM
To: Larry Schafer
Subject: Re: Thirsty?

I'll have to let you know. Pretty pressed.

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: 202-577-9354

From: Larry Schafer

Sent: Friday, May 30, 2014 8:50 AM

To: Argyropoulos, Paul

Subject: RE: Thirsty?

Ok ... any chance we can catch up next week Monday or Tuesday ... maybe lunch?

Larry Schafer

National Biodiesel Board

O: 202.737.8801


LSchafer@Biodiesel.org

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Suite 505

Washington DC 20004

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: Friday, May 30, 2014 8:42 AM
To: Larry Schafer
Subject: Re: Thirsty?

Nope. I'm off today.

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: 202-577-9354

From: Larry Schafer
Sent: Friday, May 30, 2014 8:40 AM
To: Argyropoulos, Paul
Subject: RE: Thirsty?

Are you in DC today?

Larry Schafer

National Biodiesel Board

O: 202.737.8801


LSchafer@Biodiesel.org

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www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: Monday, May 12, 2014 8:29 PM
To: lschafer@biodiesel.org
Subject: Re: Thirsty?

Always but I wasn't at the office today. Sorry

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: 202-577-9354

From: Larry Schafer
Sent: Monday, May 12, 2014 5:58 PM
To: Argyropoulos, Paul
Reply To: lschafer@biodiesel.org
Cc: Lindsay Fitzgerald
Subject: Thirsty?

Larry Schafer



=====

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
Cc: kjm@earthpace.com[kjm@earthpace.com]
From: Michael.McAdams@hklaw.com
Sent: Wed 5/14/2014 1:24:55 PM
Subject: RE: ABFA Co Location Letter to send to EPA

Paul,

We are confused by your question regarding bio-intermediates. Our letter focuses solely on the issue of co-location of processes. This issue of “the subdivision of processes between multiple facilities” was raised in the context of Sweetwater Energy in the 2014 RVO proposed rulemaking at 78 Fed. Reg. 71732, 71743 (No. 29, 2013.)

Could you help me better understand exactly what you are referring to? Happy to put together an answer.

Thanks

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Wednesday, May 14, 2014 6:49 AM
To: McAdams, Michael J (WAS - X75140)
Subject: RE: ABFA Co Location Letter to send to EPA

Hi Mike. Can you please let me know what section of the preamble you are referring to

regarding biointermediates?

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Michael.McAdams@hklaw.com [<mailto:Michael.McAdams@hklaw.com>]

Sent: Tuesday, May 13, 2014 2:53 PM

To: Grundler, Christopher

Cc: Argyropoulos, Paul; Simon, Karl; Machiele, Paul; gjohnston@gevo.com

Subject: FW: ABFA Co Location Letter to send to EPA

Chris: I want to thank you and your team for the discussions surrounding the co-location/intermediate feedstocks issues currently under discussion. Our Association has drafted the attached letter with suggestions as a follow up to our thoughtful meeting for further consideration. Wishing you all the best,

Michael McAdams | Holland & Knight

President, ABFA

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Mon 5/12/2014 8:40:42 PM

Paul: Any word on your ability to meet with the Neste guys. Neville will lead the team.

Michael McAdams | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Tue 4/22/2014 8:15:52 PM
Subject: Re: Draft Pre-Application Template for Sundrop

Just gave a interview praising this approach.

Sent using BlackBerry

From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Tuesday, April 22, 2014 03:31 PM Eastern Standard Time
To: McAdams, Michael J (WAS - X75140)
Subject: Re: Draft Pre-Application Template for Sundrop

Mike. We should chat. Also just sent announcement about revised 2013 cellulosic standard. Tried calling you. Need your mobile number.

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: 202-577-9354



Arron. Thanks for your guidance. Let's try starting with some common sense. You have already approved the pathway for thermal chemical with any backend up grade unit which is listed in the table. The only difference is the graph we sent you removes the back end unit and gives an option of utilizing the biogas from the biomass feedstock and removes the extra step of converting the biogas to syththentic gasoline.

We would be happy to resubmitt the entire front end of the process which you have already approved and listed in the table. Our effort here is to also list the biogas so that someone who spends significant capital can compete with landfill generated biogas.

I will speak to mr simons dig out the original submission which I assumed you kept and delete the backend unit which will lower the ghg footprint due to the reduction in the use of energy.

Thank you.

Sent using BlackBerry

From: Levy, Aaron [mailto:Levy.Aaron@epa.gov]
Sent: Friday, April 11, 2014 05:06 PM Eastern Standard Time
To: McAdams, Michael J (WAS - X75140)

Cc: Argyropoulos, Paul <Argyropoulos.Paul@epa.gov>; Camobreco, Vincent <Camobreco.Vincent@epa.gov>; Lie, Sharyn <Lie.Sharyn@epa.gov>; wayne.simmons@sundropfuels.com <wayne.simmons@sundropfuels.com>
Subject: Draft Pre-Application Template for Sundrop

Hello Michael,

Thanks for your question, which got referred to me as the staff lead managing the petition process for new fuel pathways .

We have discussed internally and decided that to provide an informed response we will need additional information about the fuel pathway under consideration. As part of our efforts to improve the petition process, we are in the early stages of considering the use of a pre-application template for parties that have questions about whether their fuel is eligible to generate RINs using an existing pathway, whether it is appropriate to submit a petition, and/or whether there are special issues that need to be addressed.

We believe a pre-application could be helpful for a number of reasons:

- Allows us to review summary information about your proposed pathway and respond with questions or suggested next steps.
- In some cases we may be able to determine that a petition is unnecessary. In other cases, we may be able to provide guidance on areas to focus on as you prepare your petition.
- The pre-application process is intended to save you and the Agency time as compared to submitting a full petition that was unnecessary or focused on the wrong areas.

We think your question provides a good example of where a pre-application could be helpful. As such, we also view this as a good opportunity to beta-test our draft pre-application to see how helpful it is in this case and whether we can identify areas for improvement as we develop this idea.

Attached is a draft beta-test version of the pre-application. We ask that you work with Sundrop to provide the requested information. You can return it to me via email. As this is a draft version we ask that you not circulate it to other parties except for Sundrop at this point. **Please**

be sure to indicate if any of the information provided is CBI.

Let me know if you have any questions. We welcome your input on this pre-application idea, especially any specific recommendations you may have for making it as useful as possible for the public and EPA.

Regards,

Aaron Levy

Transportation and Climate Division (TCD)

Office of Transportation and Air Quality (OTAQ)

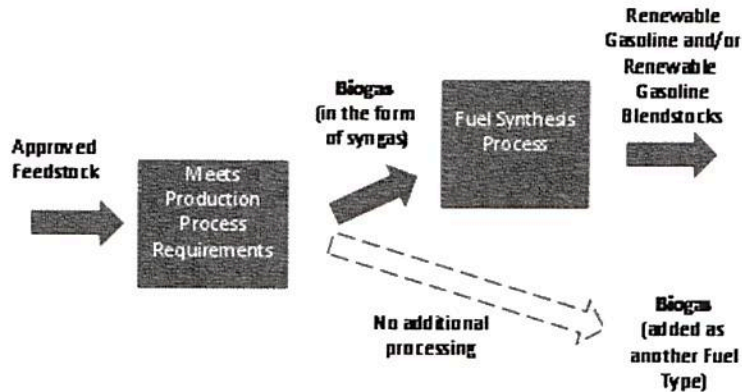
U.S. Environmental Protection Agency (EPA)

levy.aaron@epa.gov, 734-214-4586

From: Michael.McAdams@hklaw.com [mailto:Michael.McAdams@hklaw.com]
Sent: Wednesday, March 19, 2014 10:55 AM
To: Argyropoulos, Paul; Camobreco, Vincent
Cc: Wayne.Simmons@sundropfuels.com
Subject: Pathways 2 rule

Paul, Vince: Hope you are well. I am attaching a flow diagram from Sundrop Fuels which identifies an opportunity we wanted to bring to your attention. In looking at the pathway list we wanted to know whether there may be an opportunity in light of your new priorities to amend the pathways list to include biogas as a fuels type on the chart for pathway M. Allowing them this additional option could actually potential facilitate more available biogas for RIN production since their facility is located directly next to the natural gas pipeline. We are unclear, whether the current listing which only mentions renewable gasoline would allow this option without further regulatory action. Below you will find the diagram which is also attached. The blue boxes represent the currently approved Pathway M. We have added the arrow which designates the process flow diagram representing the biogas route eliminating the fuels processing piece. Thanks for your consideration. Happy to answer any questions.

Current "M" pathway



Michael McAdams | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Wed 3/26/2014 4:21:07 PM
Subject: Re: Intermediate feedstock meeting.

Thanks Paul. Look forward to seeing you tomorrow. I will get you the list this afternoon.

Sent using BlackBerry

From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Wednesday, March 26, 2014 12:15 PM Eastern Standard Time
To: McAdams, Michael J (WAS - X75140); Simon, Karl <Simon.Karl@epa.gov>
Cc: Stewart, Gwen <Stewart.Gwen@epa.gov>
Subject: RE: Intermediate feedstock meeting.

Hi Mike. Yes, please forward a complete list of your participants with names, companies and titles. I'll need to get this to security to try to speed up your entry.

Also, I highly suggest you arrive at security about 15 minutes in advance so we can start on time.

WRT a conference line, let's use:



Code:



See you tomorrow.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Michael.McAdams@hklaw.com [mailto:Michael.McAdams@hklaw.com]
Sent: Wednesday, March 26, 2014 10:01 AM
To: Argyropoulos, Paul; Simon, Karl
Subject: Intermediate feedstock meeting.

Paul and Karl: Hope you are well, know you are busy. I have a number of companies traveling to attend tomorrow's meeting from 330 to 430 to discuss the intermediate feedstock issues. Would you all like a list of the companies. Also I have at least two which would like to join by phone if possible. Could you please provide me with a number for them to dial too. Thanks.

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

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ED_000313_O365_00002601

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Tue 1/28/2014 3:56:56 PM
Subject: Reading glasses ?

Paul: Finishing up our comments as I am sure everyone else in the world is. Hope you have bought some good reading glasses. Thanks for the heads up last week very helpful and not unexpected. All the best,

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

[Add to address book](#) [View professional biography](#)

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